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ARCO Kuparuk CPF 1



May 1, 1985

Mr. Leonard D. Verrelli
Air Quality Program Manager
Alaska Department of
Environmental Conservation
Division of Environmental Quality
Pouch 0
Juneau, AK 99811

SUBJECT: 1985 Source Testing - Kuparuk River Unit, Alaska

Dear Mr. Verrelli:

By copy of this letter, we are requesting that source compliance testing required by our PSD permit (PSD-X82-01) and Air Quality Control Permit (No. 8336-AA005) be performed during the late summer months (August, September) of 1985. Summer testing has been acceptable in the past to test the units which are currently started up but have not yet had compliance tests performed.

The inclement weather and prohibitive logistic costs for multiple tests in any given year on the North Slope are the main reasons we advocate this once a year summer test program. Therefore, we recommend a summer program in lieu of the requirement that, "compliance testing shall be conducted within sixty (60) days after achieving the maximum production rate at which the source shall be operated but not later than one hundred eighty (180) days after start-up".

The only unit planned for testing this year and for which a waiver is requested is the process heater (40 MMBtu/hr) at the COTU located near CPF-1 in the Kuparuk River Unit. This heater was started up in December of 1984.

The new equipment (CPF-2) which have recently started up are similar to that of previously tested units (Ruston TB 5000 turbines, GE Frame 3 turbine and drill site heaters). Therefore in keeping with previous agency policy, no testing of these units is planned. The past policy has permitted source tests to measure the emissions of all types of sources that are present on the North Slope rather than measuring each source at each facility.

Compliance testing of the 20 MMBtu/hr Emergency Building Heater at CPF-2 is also not proposed. This unit has an emergency operational status and is used only when the normal building heating system (waste heat recovery units on turbines) fails. Because this unit does not normally operate, compliance testing does not appear to be warranted.

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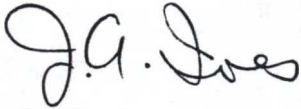


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In summary we request that you waive the compliance tests for the listed machines as described above. Should you have any questions regarding this matter, please contact me (907) 263-4307.

Sincerely,

A handwritten signature in cursive script, appearing to read "J.A. Ives".

J. A. Ives
Sr. Regulatory Compliance Engineer

JAI:tlh-0154

cc: Doug Lowery, ADEC-Fairbanks
Ray Nye, EPA-Region X-Seattle
Kathy Pazera, EPA-Juneau